



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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September 11, 2000

Mississippi River/Gulf of Mexico Nutrient Task Force
Mississippi River/Gulf of Mexico Action Plan (4503F)
C/o John Wilson, U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Dear Members of the Mississippi River/Gulf of Mexico Nutrient Task Force,

This letter provides comments from the Wisconsin Department of Natural Resources on the Draft Action Plan for Reducing, Mitigating, and Controlling Hypoxia in the Northern Gulf of Mexico (Action Plan) published in the Federal Register (FRL-6732-1) as required by Section 604(b) of Public Law 105-383. We appreciate the opportunity to comment on this national strategy.

Congratulations on tackling this difficult issue and for effectively incorporating volumes of scientific work into six impressive reports and an action plan to address the problem of hypoxia in the Gulf of Mexico. We believe the science shows that hypoxia in the Gulf of Mexico is an ecological problem that can and must be addressed and that excess nitrogen in the gulf is a primary cause of the oxygen depletion.

Wisconsin DNR strongly supports selection of a program goal established in the form of a minimum dissolved oxygen target of 2 ppm for the Gulf of Mexico or a 30 percent reduction in total nitrogen inputs to the Gulf. We also believe that measurable progress on this issue is predicated on development of an implementation package or framework that incorporates all the following components:

- * A voluntary, incentive-based program rather than a regulatory approach must be used;
- * A state-driven approach that provides flexibility necessary to design and adapt locally developed program elements based on specific environmental, economic, and social conditions at the basin scale;
- * Supplemental federal funding specifically earmarked for this program that is unencumbered by additional requirements or linkages to existing program requirements like 303(d) listing;
- * An adaptive management approach involving review of implementation progress and evaluation of the program goal at five-year intervals in light of new scientific environmental, social and economic data available at that time. This review will involve an evaluation of the technological and economic feasibility of the program goals.



Further, it is important that the full array of federal support or regulatory programs be aligned with this framework to ensure that the available tools are consistently applied as basin or sub-basin action plans are developed.

Wisconsin strongly believes these components must be provided together in an implementation package so that states may work together or individually to design approaches that are economically and technically achievable at the basin or sub-basin scale. Without state flexibility, adequate supplemental federal funding, and the other components mentioned above, achieving measurable progress in Wisconsin in concert with other states would be challenging at best.

We are committed to participating in the ongoing discussions regarding this issue and to contributing to measurable ecological improvements in the Mississippi River and Gulf of Mexico.

Sincerely,



George E. Meyer,
Secretary

*Thank you for your hard
work on this issue.*

c.

Governor Tommy Thompson
Ben Brancel, WDATCP
Carol Browner, EPA
Francis X. Lyons, EPA Region 5
NOAA Coastal Ocean Program